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Liaison Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

SCOTT STERLING, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS,
BELINDA NUCIFORA, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, and MICHAEL
ALFRED,

Defendants.

Case No. 2:22-cv-7273-JMV-MAH
Honorable John Michael Vazquez
Class Action

**Declaration of Albert Y. Chang in Support of Application for
Admission *Pro Hac Vice***

I, Albert Y. Chang, make this application to appear as counsel *pro hac vice* in the above-captioned action, and declare as follows:

1. I am a partner at Bottini & Bottini, Inc., counsel for Lead Plaintiffs, Network Racing Pty Ltd. (Robert Spano, Director), Nahi Beaini, LRJ Superannuation Fund (Marc De Stoop, Trustee), and De Stoop Investments Pty Ltd. (Joel De Stoop, Trustee) (together the "IREN Investor Group"). I am fully familiar with the facts contained herein based upon my personal knowledge. I submit this declaration in support of the application for my admission *pro hac vice* pursuant to Local Civil Rule 101.1(c)(3).

2. I am member in good standing of the courts, attached as Exhibit A is a true and correct table that identifies, to the best of my knowledge, my bar admissions, the year in which I was admitted to each bar, and, for each bar, the name and address of the official or office maintaining the roll of its numbers.

3. I am not under any suspension or disbarment by any court and have never been subjected to any disciplinary action by any court or governing body.

4. I am willing to submit to the jurisdiction of this Court to comply with all of its rules and procedures. To ensure my familiarity with these regulations I have reviewed the local rules of this court.

5. I have never been convicted of a felony crime, censured, suspended, disciplined, or disbarred by any court in any jurisdiction.

6. Cohn, Lifland, Pearlman, Herrman & Knopf, LLP is serving as local counsel on behalf of our client, in accordance with L.Civ.R. 101.1(c).

7. I understand that if I am admitted to appear and participate *pro hac vice*:

a. I shall abide by the rules governing the Courts of the State of New Jersey, including all disciplinary rules, and L.Civ.R. 101.1;

b. I shall consent to the disciplinary jurisdiction of this Court and to the appointment of the Clerk of the Supreme Court of the State of New Jersey as an agent upon whom service may be made for all actions against me and/or my firm that

may arise out of my participation in connection with this

matter;

- c. I shall notify this court immediately of any matter affecting my standing at the bar of any other Court;
- d. I shall have all pleadings, briefs, and other papers filed with the court signed by an attorney of record authorized to practice in this state;
- e. I will pay the \$150 fee provided by L.Civ.R.101.1 and the annual payment to the Ethics Financial Committee and the New Jersey Lawyers' Fund Client Protection as provided by New Jersey Rule 1:28-2(a) for each calendar year in which this case is pending.

8. I hereby submit to the jurisdiction of the United States District Court for the District of New Jersey for the purpose of discipline.

9. Defendants' Counsel consents to this application and my admissions *pro hac vice*.

I further declare under penalty of perjury that the foregoing is true and correct. Executed on August 18, 2023, at La Jolla, California.

Albert Y. Chang
Albert Y. Chang